	11	
1	Daniel R. Tamez, Esq. danieltamez@sdinjuryat	ttorney.com
2	State Bar No. 216619 GNAU & TAMEZ LAW GROUP	
3	1010 Second Avenue, Suite 1750 San Diego, CA 92101	
4	Telephone: (619) 446·6736	
5		TES DISTRICT COURT
6	FOR THE CENTRAL DIS	STRICT OF CALIFORNIA
7		
8		CASE NO. 2:11-CV-05321-CAS - JEM
9		
10	GINA CHENIER and GAYA YOSRI on behalf of themselves and all others	
11	similarly situated,	STIPULATION TO CONTINUE HEARING DATE AND EXTEND
12	Plaintiffs,	DEADLINES RELATING TO DEFENDANT'S MOTION TO
13	V.	STAY
14	ORECK CORPORATION, a Delaware Corporation,	
1516	Defendant.	
17		
18		HEARING DATE AND EXTEND EFENDANT'S MOTION TO STAY
19	1. WHEREA S, Defendant file	ed its Motion to Stay on August 15, 2011,
20	and sat it for bearing on Contamber 12. 2	
21	and set it for hearing on September 12, 2	2011;
22	2. WHEREAS , under Local	Rule 7-9, Plaintiffs' response would be
23	due no later than twenty-one (21) days	before the September 12, 2011 hearing
24		-
25	date or, by August 22, 2011, only seven	n (7) days after service of the motion on
26	August 15, 2011; and	
27		
28	ETIDLII ATION TO CONTINUE HEADING DATE AND	DEVTEND DEADI DIEG DEL ATDIO TO
	DEFENDANT'S MOTION TO STAY	D EXTEND DEADLINES RELATING TO

1	3. V	VHEREAS , Plaintiffs believe they need more time – twenty-one
2	(21) days – to	properly respond to the Motion to Stay;
3 4	4. N	OW, THEREFORE, pursuant to Local Rule 7-11, the parties sti-
5	pulate as follo	ws:
6 7	(a)	The hearing date for Defendant's Motion to Stay is continued to 10:00 a.m. on October 3, 2011;
8 9	(b)	The deadline for Plaintiffs to file their response to Motion to Stay is extended until September 12, 2011; and
10 11	(c)	The deadline for Defendant to file its reply in support of its to Motion to Stay is extended until September 19, 2011.
12 13	DATED: Au	gust, 2011.
14		
15		Respectfully submitted,
16		GNAU & TAMEZ LAW GROUP, LLP
17 18		
19		By: /s/ Daniel R. Tamez Daniel R. Tamez, Esq.
20 21		State Bar No. 216619
$\begin{bmatrix} 21 \\ 22 \end{bmatrix}$		1010 Second Ave., Suite 1750 San Diego, CA 92101
23		Telephone: (619) 446-6736 Fascimile: (619) 684-3500
24		rasemme. (017) 004-5500
25		FEARS NACHAWATI LAW FIRM, P.L.L.C. Majed Nachawati
26		State Bar No. 24038319
27		4925 Greenville Ave, Suite 715 Dallas, TX 75206
28		Telephone: (214) 890-0711
	STIPULATION TO DEFENDANT'S MO	CONTINUE HEARING DATE AND EXTEND DEADLINES RELATING TO DTION TO STAY

		Facsimile: (214) 890-0712
1		(admitted pro hac)
2		(communed provides)
3		WILSON TROSCLAIR & LOVINS, P.L.L.C. Jeremy R. Wilson
4		State Bar No. 24037722
5		302 N. Market St., Suite 510
6		Dallas, TX 75202 Telephone: (214) 484-1930
7		Facsimile: (214) 276-1475
8		(not admitted)
9		LACKEY HERSHMAN, L.L.P. Roger L. Mandel
11		State Bar No.12891750
		3102 Oak Lawn Ave., Suite 777
12		Dallas, TX 75219 Telephone: (214) 560-2201
13		Facsimile: (214) 560-2203
14		(admitted pro hac)
15		ATTORNEYS FOR PLAINTIFFS
16		ATTORICETS FOR TEARWITTS
16 17	DATED: August 2011	ATTORICETOTORTEAMVIITE
	DATED: August, 2011	ATTORICETOTORTEAMVIITE
17	DATED: August, 2011	
17 18	DATED: August, 2011	WINSTON & STRAWN LLP
17 18 19	DATED: August, 2011	WINSTON & STRAWN LLP
17 18 19 20	DATED: August, 2011	WINSTON & STRAWN LLP By: /s/ Gayle I. Jenkins
17 18 19 20 21 22	DATED: August, 2011	WINSTON & STRAWN LLP
17 18 19 20 21 22 23	DATED: August, 2011	WINSTON & STRAWN LLP By: /s/ Gayle I. Jenkins David L. Aronoff Gayle I. Jenkins Saul S. Rostamian
17 18 19 20 21 22 23 24	DATED: August, 2011	WINSTON & STRAWN LLP By: /s/ Gayle I. Jenkins David L. Aronoff Gayle I. Jenkins Saul S. Rostamian 33 S. Grand Ave.
17 18 19 20 21 22 23	DATED: August, 2011	WINSTON & STRAWN LLP By: /s/ Gayle I. Jenkins David L. Aronoff Gayle I. Jenkins Saul S. Rostamian 33 S. Grand Ave. Los Angeles, CA 90071
17 18 19 20 21 22 23 24	DATED: August, 2011	WINSTON & STRAWN LLP By: /s/ Gayle I. Jenkins David L. Aronoff Gayle I. Jenkins Saul S. Rostamian 33 S. Grand Ave. Los Angeles, CA 90071 Telephone: (213) 615-1700
17 18 19 20 21 22 23 24 25	DATED: August, 2011	WINSTON & STRAWN LLP By: /s/ Gayle I. Jenkins David L. Aronoff Gayle I. Jenkins Saul S. Rostamian 33 S. Grand Ave. Los Angeles, CA 90071
17 18 19 20 21 22 23 24 25 26	DATED: August, 2011	WINSTON & STRAWN LLP By: /s/ Gayle I. Jenkins David L. Aronoff Gayle I. Jenkins Saul S. Rostamian 33 S. Grand Ave. Los Angeles, CA 90071 Telephone: (213) 615-1700
17 18 19 20 21 22 23 24 25 26 27		WINSTON & STRAWN LLP By: /s/ Gayle I. Jenkins David L. Aronoff Gayle I. Jenkins Saul S. Rostamian 33 S. Grand Ave. Los Angeles, CA 90071 Telephone: (213) 615-1700 Facsimile: (213) 615-1750

CERTIFICATE OF SERVICE

I certify that on August 22, 2011, I electronically filed the above Stipulation to Continue Hearing and Extend Deadlines related to Defense Motion to Stay with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or by U. S. mail for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

_/s/ Daniel R. Tamez
Daniel R. Tamez

STIPULATION TO CONTINUE HEARING DATE AND EXTEND DEADLINES RELATING TO DEFENDANT'S MOTION TO STAY